



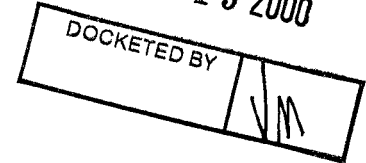
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AZ CORP COMMISSION
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BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission
DOCKETED
MAY 15 2000



CARL J. KUNASEK
Chairman

JIM IRVIN
Commissioner

WILLIAM A. MUNDELL
Commissioner

IN THE MATTER OF US WEST)
COMMUNICATIONS, INC.'S)
COMPLIANCE WITH SECTION 271)
OF THE TELECOMMUNICATIONS)
ACT OF 1996)

Docket No: T-00000A-97-0238

**MCI WORLDCOM'S COMMENTS ADDRESSING THE STAFF'S
INTERIM REPORT ON THE ARIZONA MASTER TEST PLAN**

MCI WorldCom, Inc., nka WorldCom, Inc., ("WCom") submits these comments to the Interim Report of Staff concerning the Arizona Master Test Plan ("MTP").

UNE-P (Unbundled Network elements – Platform)

The Master Test Plan is described in version 4.0 as follows: "This Master Test Plan sets forth the approach, scope and focus, timeline, roles and responsibilities, testing phases (planning, preparation, execution, and analysis/reporting), and all associated required activities for the testing of the CLEC access that US WEST provides to its OSS."

WCom requested the MTP Testing Scenarios for UNE-P be modified to specify the following full production line of UNE-P: new, disconnect, conversion "as is", conversion "as specified" and conversion with "directory listing change(s) (DL)." The Staff agreed this "should be done" but would be "most appropriately accomplished through the TAG process and modification of the Test Standards Document ("TSD")."

Recently Colorado¹ and Minnesota² entered rulings that US WEST's interpretation of UNE-P is too limiting. In Docket No. 00B-011T, the Colorado Commission issued Decision No. C00-479 and addressed UNE-P as follows:

The Commission has previously ruled upon the issue regarding US WEST's obligation to combine UNEs requested by CLECs.¹ We have determined that US WEST should be required to combine UNEs for CLECs in the same manner that it normally combines them for itself. *See* Decision No. C98-1047. The same result should occur here. We accept Sprint's position and will require US WEST to combine UNEs in any manner in which UNEs are ordinarily combined within US WEST's network. US WEST's position on provision of UNE combinations being limited to those UNEs that are already combined or pre-existing is rejected.

In footnote 1 above, the Colorado Commission stated:

To the extent US WEST asserts that our authority to order combinations of network elements is limited because FCC Rules 47 C.F.R. 51.315(c-f) were vacated by the Eighth Circuit Court of Appeals, Iowa Utilities Board v. FCC, 120 F. Ed 753 (8th Cir. 1997), we disagree. We affirm our prior ruling in Decision No. C98-267 that the Commission possesses independent authority under State law to order combinations of network elements.

¹ In the Matter of the Petition of Sprint Communications Company, L.P. for arbitration pursuant to U.S. Code § 252(b) of the Telecommunications Act of 1996 to establish an interconnection agreement with U S WEST Communications, Inc, Initial Commission Decision, issued Date: May 5, 2000.

² Docket No. P-421/CI-99-786, In the Matter of the Federal Court Remand of Issues Proceeding from the Interconnection Agreements Between U S WEST Communications, Inc. and AT&T, MCI, MFS, and AT&T Wireless, Order after Remand, before the Minnesota Public Utilities Commission, issued March 14, 2000.

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Dated: May 15, 2000

LEWIS AND ROCA LLP



Thomas H. Campbell
40 N. Central Avenue
Phoenix, Arizona 85007
Attorneys for MCI WorldCom, Inc.

- AND -

Thomas F. Dixon
MCI WorldCom, Inc.
707 -17th Street, #3900
Denver, Colorado 80202
303-390-6206

ORIGINAL and ten (10) copies
of the foregoing filed this 15th
day of May, 2000 with:

Arizona Corporation Commission
Utilities Division – Docket Control
1200 W. Washington Street
Phoenix, Arizona 85007

COPY of the foregoing hand-
delivered this 15th day of May,
2000, to:

Maureen Scott
Legal Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Jerry Rudibaugh,
Chief Hearing Officer
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

LEWIS
AND
ROCA
LLP
LAWYERS

1 Deborah Scott, Director
Utilities Division
2 Arizona Corporation Commission
1200 W. Washington Street
3 Phoenix, Arizona 85007

4 COPY of the foregoing mailed
5 this 15th day of May, 2000, to:

6 Scott Wakefield
Residential Utility Consumer Office
7 2828 N. Central Avenue
Phoenix, Arizona 85004

8 Maureen Arnold
9 US West Communications, Inc.
3033 N. Third Street
10 Room 1010
Phoenix, Arizona 85012

11 Mark Dioguardi
12 Tiffany and Bosco PA
500 Dial Tower
13 1850 N. Central Avenue
Phoenix, Arizona 85004

14 Thomas L. Mumaw
15 Snell & Wilmer
One Arizona Center
16 Phoenix, Arizona 85004-0001

17 Andrew O. Isar
TRI
18 4312 92nd Avenue N.W.
Gig Harbor, Washington 98335

19 Michael Patten
20 Brown & Bain, P.A.
2901 N. Central Avenue
21 Phoenix, Arizona 85012

22 Timothy Berg
Fennemore, Craig, P.C.
23 3003 N. Central Avenue
Suite 2600
24 Phoenix, Arizona 85012-3913

LEWIS
AND
ROCA
LLP
LAWYERS

- 1 Thomas M. Dethlef
Andrew D. Crain
- 2 Charles Steese
US West, Inc.
3 1801 California Street, Ste. 5100
Denver, Colorado 80202
- 4 Joan S. Burke
5 Osborn & Maledon
2929 N. Central Avenue
6 21st Floor
Phoenix, Arizona 85067-6379
- 7 Michael M. Grant
8 Gallagher & Kennedy
2600 N. Central Avenue
9 Phoenix, Arizona 85004-3020
- 10 Richard M. Rindler
Morton J. Posner
- 11 Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
12 Washington, D.C. 20007-5116
- 13 Carrington Phillip
Cox Communications, Inc.
14 1400 Lake Hearn Drive, N.E.
Atlanta, Georgia 30319
- 15 Penny Bewick
16 Electric Lightwave, Inc.
4400 NE 77th Avenue
17 Vancouver, Washington 98662
- 18 Raymond S. Heyman
Randall H. Warner
- 19 Roshka Heyman & DeWulf
Two Arizona Center
20 400 Fifth Street
Suite 1000
21 Phoenix, Arizona 85004
- 22 Diane Bacon, Legislative Director
Communications Workers of America
23 5818 North 7th Street
Suite 206
24 Phoenix, Arizona 85014-5811
- 25
- 26

LEWIS
AND
ROCA
LLP

LAWYERS

- 1 Charles Kallenback
ACSI
- 2 131 National Business Parkway
Annapolis Junction, Maryland 20701
- 3 Richard Smith
- 4 Cox California Telecom, Inc.
Two Jack London Square
- 5 Oakland, California 94697
- 6 Bill Haas
Richard Lipman
- 7 McLeod USA
6400 C Street S.W.
- 8 Cedar Rapids, Iowa 54206-3177
- 9 Joyce Hundley
United States Department of Justice Antitrust Division
- 10 1401 H Street, N.W.
Suite 8000
- 11 Washington, D.C. 20530
- 12 Darren Weingard
Sprint Communications Co., L.P.
- 13 1850 Gateway Drive
7th Floor
- 14 San Mateo, California 94404-2567
- 15 Richard S. Wolters
AT&T & TCG
- 16 1875 Lawrence Street
Suite 1575
- 17 Denver, Colorado 82002
- 18 Daniel Waggoner
Davis Wright Tremaine
- 19 2600 Century Square
15011 Fourth Avenue
- 20 Seattle, Washington 98101-1688
- 21 Elaine Miller
NextLink Communications, Inc.
- 22 500 108th Avenue NE
Suite 2200
- 23 Bellevue, Washington 98004
- 24 Richard Smith
Cox California Telecom, Inc.
- 25 Two Jack London Square
Oakland, CA 94697
- 26

LEWIS
AND
ROCA
LLP
LAWYERS

1 Philip Doherty
2 545 S. Prospect Street
3 Suite 22
4 Burlington, VT 05401

5 Craig Marks
6 Citizens Utilities Company
7 2901 N. Central Avenue
8 Suite 1660
9 Phoenix, Arizona 85012

10 Douglas Hsiao, Esq.
11 Rhythms Links Inc.
12 6933 S. Revere Parkway
13 Englewood, CO 80112

14 David Kaufman
15 e-spire Communications, Inc.
16 466 W. San Francisco Street
17 Santa Fe, NM 87501

18 W. Hagood Bellinger
19 5312 Trowbridge Drive
20 Dunwoody, GA 30338

21
22
23
24
25
26
